

1 PILLSBURY WINTHROP SHAW PITTMAN  
2 LLP  
3 STACIE O. KINSER (Cal. Bar No. 300529)  
4 stacie.kinsler@pillsburylaw.com  
5 JEREMY F. RUEF (Cal Bar No. 336472)  
6 jeremy.ruef@pillsburylaw.com  
7 Four Embarcadero Center, 22<sup>nd</sup> Floor  
8 San Francisco, CA 94111  
9 Telephone: 415.983.1000  
10 FAXSIMILE: 415.983.1200

11 PILLSBURY WINTHROP SHAW PITTMAN  
12 LLP  
13 CASEY LOW (Tex. Bar No. 24041363)  
14 *Pro Hac Vice*  
15 casey.low@pillsburylaw.com  
16 SARAH GOETZ (Tex. Bar No. 24109930)  
17 *Pro Hac Vice*  
18 sarah.goetz@pillsburylaw.com  
19 401 Congress Ave., Suite 1700  
20 Austin, TX 78701  
21 Telephone: 512.580.9600  
22 Facsimile: 512.375.4901

23 Attorneys for Plaintiff and Cross-Defendant  
24 SCHRADER CELLARS, LLC

25  
26  
27  
28 **UNITED STATES DISTRICT COURT**  
29  
30 **NORTHERN DISTRICT OF CALIFORNIA**

31 SCHRADER CELLARS, LLC,

32 Case No. 3:21-cv-01431-SK

33 Plaintiff,

34 **SCHRADER CELLARS, LLC'S  
35 PROPOSED VERDICT FORM**

36 vs.

37 ROBERT M. (RANDY) ROACH, JR.,

38 Defendant.

1 Plaintiff Schrader Cellars, LLC (“Schrader Cellars” or “Plaintiff”) hereby submits its  
2 respective portion of the proposed verdict form.

3

4 1. Did Randy Roach breach a fiduciary duty owed to Schrader Cellars in a manner that was  
a substantial factor in causing harm to Schrader Cellars?

5 Yes \_\_\_\_\_ No \_\_\_\_\_

6

7 *If yes, proceed to Question 2.*

8

9 2. What damages did Schrader Cellars incur as a result of this harm?

10 Past Economic Loss \_\_\_\_\_

11

12 *If you entered an amount in response to Question 2, proceed to Question 3. If you did not enter  
an amount in response to Question 2, stop here, answer no further questions, and have the  
presiding juror sign and date this form.*

13

14 3. Should Schrader Cellars receive prejudgment interest on its loss?

15 Yes \_\_\_\_\_ No \_\_\_\_\_

16

17

18

19

20

21

22

23

24 (Signature of jury foreperson) \_\_\_\_\_ Date \_\_\_\_\_

1 DATED: February 9, 2023

/s/ Stacie O. Kinser

2 Stacie O. Kinser

3 **PILLSBURY WINTHROP SHAW PITTMAN**  
4 **LLP**

5 STACIE O. KINSER (Cal. Bar No. 300529)

6 stacie.kinser@pillsburylaw.com

7 JEREMY F. RUEF (Cal Bar No. 336472)

jeremy.ruef@pillsburylaw.com

8 Four Embarcadero Center, 22<sup>nd</sup> Floor

9 San Francisco, CA 9411

10 Telephone: 415.983.1000

11 Facsimile: 415.983.1200

12 CASEY LOW (Tex. Bar No. 24041363)

13 *Pro Hac Vice*

14 casey.low@pillsburylaw.com

15 SARAH GOETZ (Tex. Bar No. 24109930)

16 *Pro Hac Vice*

17 sarah.goetz@pillsburylaw.com

18 401 Congress Ave., Suite 1700

19 Austin, TX 78701

20 Telephone: 512.580.9600

21 Facsimile: 512.375.4901

**CERTIFICATE OF SERVICE**

The undersigned certifies that on February 9, 2023, the foregoing document was electronically filed with the Clerk of the Court for the UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA, using Court's Electronic Case Filing (ECF) system. The ECF system routinely sends a "Notice of Electronic Filing" to all counsel of record who have consented to accept this notice as service of this document by electronic means. Any party not receiving the Court's electronic notification will be sent a copy of the foregoing document.

/s/ Stacie O. Kinser

Stacie O. Kinser